

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE

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Docket No. N2011-1

**INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE
TO NATIONAL LEAGUE OF POSTMASTERS WITNESS MARK STRONG
(USPS/NLPM-RT1-1 THROUGH 54)**

Pursuant to Rules 25 through 27 of the Postal Regulatory Commission's Rules of Practice and Procedure, the Postal Service respectfully submits the following discovery requests to National League of Postmasters witness Mark Strong (NLPM-RT-1). Incorporated herein are the definitions and instructions accompanying the September 29, 2011 interrogatories directed by the Postal Service to NAPUS witness Artery.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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USPS/NLPM-RT1-1

Please refer to your testimony at page 5, lines 15-17. Explain the basis for your assertion there that the Postal Service intends to discontinue retail operations at all of the Post Offices on the Retail Optimization Initiative candidate list.

USPS/NLPM-RT1-2

Please refer to your testimony at page 5, lines 20-21, and explain the basis for your assertion that the RAO Initiative reflects a determination by the Postal Service to "concentrate its focus on providing service to large urban and suburban areas."

USPS/NLPM-RT1-3.

On page 5, lines 11-12 of your testimony, you express your agreement with statements attributed to Mr. Mark Jamison to the effect that this proceeding consists of "a request to abandon the concept of universal service."

- (a) Please define "universal service" as you understand it.
- (b) Upon what sources of authority do you rely for your definition or understanding of universal service?
- (c) Do you believe that the mere initiation of a feasibility study of a Post Office, station, or branch for discontinuance amounts to a denial of universal service?
- (d) If the answer to part (c) is affirmative, please explain your answer.
- (e) Do you believe that universal service is equivalent to access to retail and delivery services? Please explain.
- (f) Do you believe that the concept of access to retail and delivery services is a subset of universal service? Please explain.
- (g) Do you believe that the concept of universal service is a subset of access to retail and delivery service? Please explain.

USPS/NLPM-RT1-4

In the course of your career as a Postmaster, did you ever:

- (a) Identify a situation where customers were being denied universal service?
- (b) If the answer to part (a) is affirmative, please explain the circumstances, including date(s).
- (c) If the answer to part (a) is affirmative, please explain whether you elevated such situations to the attention of senior management.

USPS/NPLM-RT1-5

Please refer to your testimony at page 7, lines 12-16. Is the Postal Service obliged to meet every "need" for postal service expressed by rural postal customers on the terms and conditions expressed by those customers? If your response is affirmative, please explain.

USPS/NLPM-RT1-6

Please refer to the statement at page 5, line 18 of your testimony concerning your representations regarding universal service. Assume a Post Office offering Post Office Box delivery to a small community of 300 residents is discontinued and replacement service is offered by rural carrier, with retail services offered to roadside mailboxes along the carrier's line of travel. The "gaining" and nearest Post Office is 3 miles away.

- (a) Please identify with particularity all aspects of universal service that would be denied as a result of discontinuance of the Post Office in this hypothetical.
- (b) Please confirm whether customers of the discontinued Post Office would lack access to retail services after the discontinuance. If you do not confirm, please explain.
- (c) Please confirm whether customers of the discontinued Post Office would lack access to delivery services after the discontinuance. If you do not confirm, please explain.
- (d) Did customers who were served by delivery to roadside mailboxes by the rural carriers that you managed lack access to retail or delivery services? Please explain your answer.

USPS/NPLM-RT1-7

In relation to your term of your service as Postmaster of Prescott, Arizona, which you mention on page 4, line 3 of your testimony, please provide a map showing:

- (a) The geographic area served by delivery carriers reporting to you as a Postmaster or to subordinate units under your command.
- (b) Identification of any stations, branches, or contract postal units reporting to you as a Postmaster.
- (c) Identification of areas served by Rural or Highway Contract Route carriers (the routes themselves need not be marked).
- (d) The approximate farthest distance that a customer in the geographic area identified in part (a) would have to travel from a residence to a Postal Service operated retail facility.

USPS/NLPM-RT1-8

In relation to your term of your service as Postmaster of Glendale, Arizona, which you mention on page 4, line 4 of your testimony. Please provide a map showing:

- (a) The geographic area served by delivery carriers reporting to you as a Postmaster or to subordinate units under your command.
- (b) Identification of any stations, branches, or contract postal units reporting to you as a Postmaster.
- (c) Identification of areas served by Rural or Highway Contract Route carriers (the routes themselves need not be marked).
- (d) The approximate farthest distance that a customer in the geographic area identified in part (a) would have to travel from a residence to a Postal Service operated retail facility.

USPS/NLPM-RT1-9

Please refer to your testimony at pages 3-4. For each postal facility at which you have been employed for longer than a year, please indicate the calendar years during which you were employed there. Also indicate for each facility whether, at the time, it was a "small rural office."

USPS/NLPM-RT1-10

In relation to your service as Postmaster of Sun City, Arizona, which you mention on page 3, lines 4-6 of your testimony, please provide a map showing:

- (a) The geographic area served by delivery carriers reporting to you as a Postmaster or to subordinate units under your command.
- (b) Identification of any stations, branches, or contract postal units reporting to you as a Postmaster.
- (c) Identification of areas served by Rural or Highway Contract Route carriers (the routes themselves need not be marked).
- (d) The approximate farthest distance that a customer in the geographic area identified in part (a) would have to travel from a residence to a Postal Service operated retail facility.
- (d) Please also state whether, as a result of your day-to-day responsibilities as an officer of the National League of Postmasters, the day-to-day responsibilities of Sun City AZ Postmaster have been or currently are the responsibility of another postal employee at that office.

USPS/NLPM-RT1-11

Please refer to your testimony at page 4, line 14 and state whether the day-to-day duties of Avondale/Goodyear AZ Postmaster currently are the responsibility of a postal employee other than the one identified in your testimony. If so, please explain.

USPS/NLPM-RT1-12

Page 5, line 19 of your testimony characterizes the Postal Service as having "urban-based leadership."

- (a) Please explain what you intend to convey by this statement.
- (b) Is your statement intended to characterize where members of Postal Service management currently live, or where they were originally raised as children, or developed as young adults, or some combination thereof?
- (c) Identify the member(s) of postal management that you believe comprise this "urban-based leadership."
- (d) Please confirm that the "urban based leadership" of the Postal Service has included classified stations, branches and annexes within the scope of the RAO Initiative. If not confirmed, please explain. Identify which of these types of facilities are typically located in urban and suburban areas.

USPS/NLPM-RT1-13

At page 5, line 15 of your testimony, you state that the Postal Service's proposal to examine the feasibility of whether to discontinue operations at any of 3650 candidate facilities "essentially produces a drastic reduction in availability and service."

- (a) In what way does a proposal to examine the feasibility of discontinuing the retail operations at particular postal retail facilities within the scope of the Retail Access Optimization Initiative "essentially produce[] . . . a drastic reduction in availability and service"?
- (b) In your opinion, what is the highest percentage of retail closures among the approximately 3650 RAO Initiative candidate facilities that would result in a "reduction in availability and service" that you would characterize as being less than "drastic"?

USPS/NLPM-RT1-14

Please refer to your testimony at page 5, lines 15-18. Please provide a copy of any official postal document containing the "nonsense" statement referenced there. In the alternative, please provide a copy of and citation (including internet links) to published accounts of the statement. If the statement was uttered orally, please provide the name and job title of the speaker, and indicate the date on which and the audience to whom the statement was uttered.

USPS/NLPM-RT1-15

- (a) Please refer to your testimony at page 9, line 7. Identify the "basic" public policy with which the Retail Access Optimization Initiative conflicts and explain how it conflicts with that policy.
- (b) In your view, what accounts for the failure of the Postal Regulatory Commission to opine in its Docket No. N2009-1 advisory opinion that the Station and Branch Optimization and Consolidation Initiative conflicted with that same "basic" public policy?

USPS/NLPM-RT1-16

Please refer to your testimony at page 11, lines 8-18.

- (a) Can a community have an identity without having a Post Office?
- (b) Can a community have pride without having a Post Office?
- (c) Can a community have an anchor and hub without having a Post Office?
- (d) Can a community have an anchor and hub that is not a Post Office?
- (e) Does the Postal Service have an obligation to bind the nation together though the provision of facilities in which to conduct non-postal transactions and manage non-postal civic and social affairs?
- (f) Does the Postal Service have an obligation to establish and maintain facilities of such character and in such locations as to accommodate the needs of postal patrons to conduct non-postal transactions and manage non-postal civic and social affairs?

USPS/NLPM-RT1-17

Please refer to your testimony at page 14, lines 16-18.

- (a) Please identify the specific offices that any Vice President from USPS Headquarters directed be closed as part of the RAO Initiative by the date that your testimony was filed.
- (b) Please confirm that it is your understanding that the retail optimization initiative reviewed by the Postal Regulatory Commission in Docket No. N2009-1 utilized the USPS Handbook PO-101. If you do not confirm, please explain.
- (c) Please confirm that it is your understanding that the retail optimization initiative reviewed by the Postal Regulatory Commission in Docket No. N2009-1 was a top-down initiative. If you do not confirm, please explain.
- (d) To your knowledge, how many of the over 3000 stations and branches reviewed for discontinuance as part of the above-referenced Docket No. N2009-1 initiative were eliminated from consideration for discontinuance on the basis of recommendations from District discontinuance review teams?
- (e) Please review Docket No. N2009-1, USPS Library Reference N2009-1/4. To your knowledge, how many USPS District Managers were subjected to or currently are under threat of adverse career consequences resulting from the fact that the percentage of the over 3000 SBOC candidate facilities not recommended for discontinuance greatly exceeded the five percent of SBOC candidate stations and branches ultimately discontinued?

USPS/NLPM-RT1-18

Please refer to your testimony at page 15, lines 2-7 and the USPS Handbook PO-101. Please explain your understanding of which administrative level of Postal Service management initiates discontinuance studies and then submits them to the Area Office and Headquarters for review.

USPS/NLPM-RT1-19

Please refer to page 17, line 6 of your testimony.

- (a) Please list and describe the sociological, economic, political and other specific characteristics that define a "typical" community in the United States and that distinguish it from one that is atypical.
- (b) Is the opinion in your testimony that Odd, West Virginia is a typical community your own or that of "one of [y]our postmasters"? Either way, please explain the supporting basis for the opinion.
- (c) Please provide examples of "typical" and "atypical" communities you reviewed in assessing how to categorize Odd, West Virginia, and explain the basis for categorizing them.

USPS/NLPM-RT1-20

Please refer to your testimony at page 16, line 21. What percentage of rural Post Office customers visit the office every day that it is open. Please provide the data supporting that figure and describe how they were tabulated.

USPS/NLPM-RT1-21

- (a) Please provide the data you reviewed in preparing that portion of your testimony which asserts that "small towns tend to have the highest concentrations of elderly people." Please discuss how those data compare to data for other population centers.
- (b) Please provide copies of or citations (including internet links) to sociological studies documenting the role that Post Offices play as a gathering point for retirees and serve as sources of non-postal information for retirees, relative to other gathering points and information sources.
- (c) Please provide copies of or citations (including internet links) to economic, sociological, law enforcement, or labor and employment studies on which you relied in preparing your testimony which quantify the impact that "rural post office[s] . . . have on local business development, existing businesses, [and] law enforcement, [and] community jobs . . . " relative to other factors.

USPS/NLPM-RT1-22

Please refer to your testimony at page 3, lines 3-6. Your career includes service as a Postmaster.

- (a) Please explain whether, during your career as a Postmaster, you participated in any decisions to discontinue a Post Office, or to consolidate a Post Office (as that term is currently used in USPS Handbook PO-101).
- (b) If the answer to part (a) is affirmative, please provide specific information concerning the Post Office(s) in question.
- (c) Please explain whether, during your career as a Postmaster, you participated in any decisions to suspend operations of a Post Office under Handbook PO-101.
- (d) If the answer to part (c) is affirmative, please provide specific information concerning the Post Office(s) in question.
- (e) Please explain whether, during your career as a Postmaster, your position level or grade was elevated as the result of the discontinuance or consolidation of a Post Office.
- (f) If the answer to part (e) is affirmative, please provide specific information concerning the elevation.
- (g) Were you responsible as a Postmaster for any community post offices or other types of contract postal units in your service area?
- (h) If the answer to (g) is affirmative, please provide specific information concerning the community post office or contract postal unit retail facilities in question.
- (i) Did you manage Rural or Highway Contract Route carriers during your career as a Postmaster?

- (j) If the answer to part (i) is affirmative, please provide specific information on the number of Rural or Highway Contract Route carriers that you managed.

USPS/NLPM-RT1-23

Please refer to your testimony at page 21, lines 10-11. Please identify, provide a copy of (if it is not already a matter of record in this docket), and cite the specific passage in the Postal Service document that forms the basis for your assertion that the Postal Service *almost seems to suggest* that "electronics has opened up other communications sources for rural America, and that the role of post offices in rural America has become passé."

USPS/NLPM-RT1-24

- (a) Please define "urbanite" as you use the term at page 21, line 3 of your testimony.
- (b) Please define "good mail service," as you use the term at page 21, line 6 of your testimony.

USPS/NLPM-RT1-25

Your testimony at page 6, lines 17-20 states, "While this proceeding is technically only focused on the 3,650 post offices that are currently on the chopping block, it is no secret that a much larger group—up to half of the post offices in the country—are waiting in the wings for their turn. That includes every small rural post office in the country."

- (a) Define "post office" as you use it in this passage.
- (b) Define the universe of "every small rural post office in the country."
- (c) Please confirm that it is your understanding that the RAO Initiative is limited to the approximately 3650 retail facilities identified in USPS-T-1.

USPS/NLPM-RT1-26

Your testimony at page 7, lines 13-15 states, "This includes providing full post office services, for they are vital to rural America, cost practically nothing, and are viewed as essential by rural Americans."

- (a) Confirm that your claim that providing post offices costs "practically nothing" is based on a comparison of the cost of operations of Post Offices as compared to the total costs of the Postal Service. If not confirmed, please explain.
- (b) Please state your understanding of the costs of providing post office services. In your estimation, how much is this cost, and how do you quantify it? Please provide all calculations.

USPS/NLPM-RT1-27

- (a) Please refer to your testimony at page 25, line 6 and explain what makes the route from DeWitt to Flat Rock KY unsuitable for senior citizens.

- (b) In addition to the elementary School and the Baptist Church, please confirm that there are other churches, as well as businesses located in Dewitt KY.

USPS/NLPM-RT1-28

Please identify and provide citations (including internet links) to the primary sources for the data described at page 22 of your testimony at lines 6-20.

USPS/NLPM-RT1-29

At page 12, lines 11-12 of your testimony, you state, "The primary purpose of the RAO Initiative is to reduce costs."

- (a) Please state the basis for this claim, with applicable citations to the record.
- (b) Did you read the Request in this docket before finalizing your testimony?
- (c) If your answer to part (b) is affirmative, please confirm that the Request in this docket identifies a number of different goals of the RAO initiative. Please confirm that cost savings is only of several goals identified for the RAO Initiative

USPS/NLPM-RT1-30

Your testimony at pages 8-9 states, "Widespread information from the field indicates that in too many cases the 'community meetings' are simply canned briefings designed for public relations purposes, in order to create the illusion that the Postal Serviced is taking into account the needs of these communities and is following both the spirit and letter of the law."

- (a) Did you personally observe community meetings that fit this description?
- (b) If the answer to part (a) is affirmative, please provide the locations of the community meetings that you attended, dates and names of the Post Offices that the meetings concerned, along with copies of any notes or memoranda you or your staff generated in connection with your observations.

USPS/NLPM-RT1-31

At page 23, lines 1-6, of your testimony, you state, "the League has determined that Saint Francis, Arkansas, has 104 rented boxes; 67 of these residents do not have internet. New Hope, Arkansas, has 81 rented boxes; 22 do not have internet. Three towns in Iowa—Gravity, Grant, and Beaver—have limited internet access and elderly communities without computers. In the mountains of West Virginia, I would think the situation is even more drastic." Please define "limited internet access" as used in the quoted passage.

USPS/NLPM-T1-32

Please refer to your testimony at page 23, lines 8-9.

- (a) Please specifically identify the phenomenon of which you have received "many specific examples" and list and describe each example.
- (b) Please describe the differences between examples where you have concluded that that the Postal Service did adequately take into account

- the unique needs of a community and those where you have concluded to the contrary.
- (c) Please list and describe examples of cases in which you have concluded that the Postal Service did adequately take into account the unique needs of a community.

USPS/NLPM-RT1-33

At page 11, lines 7-16 of your testimony, you state and quote from a website the following passage: “Even today, in the ‘information age,’ post offices: ‘serve as a community anchor and hub, they give a place an identity, they support small businesses by providing easy access and low mailing costs, they bring foot-traffic into nearby stores and restaurants, they save countless miles of driving time and fuel by serving as nodes on a vast network, they provide services that no Wal-Mart postal counter can do (like passports and emergency preparedness), they are often housed in beautiful historic buildings that are a source of local pride, and they represent the presence of the federal government in every community and remind people that the government is capable of doing some things right.

- (a) Do you know how many Post Offices (excluding stations and branches) that are part of the RAO Initiative currently provide passport services? If your answer is affirmative, please provide that number. If you do not know, what percentage of Post Offices would you estimate provide passport services?
- (b) If your answer to part (a) is negative, what research did you conduct on the provision of passport services at Post Offices that are part of the RAO initiative?
- (c) Please identify all of the emergency preparedness services that are provided at Post Offices, and identify the source of authority that directs Post Office managers to conduct such emergency preparedness activities.

USPS/NLPM-RT1-34

On page 12, in footnote 1 of your testimony, you state, “The total net cost of the 10,000 smallest Post Offices—more than one-third of all Post Offices in the United States—is less than seven tenths of one percent (0.7%) of the total costs of the United States Postal Service.” Please provide the calculations you used to arrive at this figure, and document the sources of each figure used.

USPS/NLPM-RT1-35

At page 28 lines 18-19 of your testimony, you state that “The law specifically forbids the Postal Service to close Post Offices because they are not profitable.”

- (a) Please identify the law to which you refer and quote the applicable passage(s) and provide all citations.
- (b) Do you deny that the law prohibits the closing of a “small” post office “solely” for operating at a deficit?

USPS/NLPM-RT1-36

Please explain how the text of the email copied on page 29 of your testimony supports the assertion that "the Postal Service has been taking steps that both hinder meaningful community input, while simultaneously cutting off post offices as though the decision to close them has already been made." In doing so, explain whose decision it was not to refer to the email in USPS Library Reference N2011-1/16 that was responsive to the one you quote on page 29. Please attach a copy of the responsive email in your response to this interrogatory.

USPS/NLPM-T1-37

Pages 23 -26 of your testimony reflect assertions regarding the number or percentage of Post Office Box holders at particular Post Offices who have internet or broadband internet service. Please provide a complete description of how these data were derived, including:

- (a) the methods by which the data were collected;
- (b) how and by whom respondents were identified and notified of the opportunity to participate in the survey;
- (b) copies of all data collection and survey instruments or questionnaires used to record responsive data;
- (c) copies of all lists of questions distributed to survey takers to read to survey respondents;
- (d) copies of all instructions disseminated to those who conducted surveys or distributed questionnaires;
- (e) the methods and media through which questionnaires or solicitations regarding survey participation were disseminated to survey respondents;
- (g) the locations where notices soliciting survey participation were posted;
- (h) the rate of postage paid for survey documents placed in Post Office Boxes of any survey participants;
- (i) for each location where survey takers interacted face-to-face with survey respondents as part of the survey process, specify the addresses at which and the hours of the day during which such interactions occurred, and indicate whether any of the addresses are postal retail locations;
- (j) the name(s) of the person(s) responsible for composing the questionnaires or survey questions and supervising the survey effort;
- (k) identification of the person under whose direction the research was conducted;
- (l) Such other information pertinent to the data collection effort as would be responsive to Rule 31(k) of the Commission's Rules of Practice and Procedure.
- (m) a description of the study plan underpinning the research used to draw the conclusions in the quoted passage, a clear description of the research design, the techniques or procedures used to compile the data, and the definition of the universe under study.
- (n) the date (month, day, and year) on which the research began and the date (month, day, and year) on which the research ended (i.e., the survey period).

- (o) Please provide a complete copy of the research results
- (p) Please define "limited internet access" as used in at page 23, line 4 of your testimony.

USPS/NLPM-RT1-38

Your testimony states at page 12, line 6 that "Many small rural post offices have already closed."

- (a) What is the source of this claim?
- (b) How many Post Offices were discontinued between 1996 and 2009?
- (c) For purposes of the questions below, a "management-initiated" discontinuance action means a discontinuance action where management conducts a feasibility study and discontinuance action due to a Postmaster vacancy.
 - (i) Please confirm that Postal Service management did not initiate any management initiated discontinuance actions of Post Offices between 2002 and 2008. If not confirmed, please explain your response.
 - (ii) Please confirm that you or your predecessors were personally involved in discussions with Postal Service management relating to decisions not to pursue management-initiated Post Office closings between 2002 and 2008. If not confirmed, please explain your response.

USPS/NLPM-RT1-39

At page 13 of your testimony, you state, "The Postal Service has not taken into account the full extent of the costs of extending delivery to those customers who will now receive their mail at their home, nor the cost of servicing an NDCBU by the carrier if that is the chosen delivery mode."

- (a) How many Post Office discontinuance records did you review before finalizing your testimony?
- (b) Do you deny that when Rural or Highway Contract Route delivery is provided as replacement service in a Post Office discontinuance action, the cost of replacement service is included in the economic savings calculation in the Proposal and Final Determination?
- (c) Have you ever established Rural or Highway Contract Route service for new delivery points?
- (d) If the answer to part (c) is affirmative, how did you estimate the cost of providing this service?
- (e) How are rural carriers compensated for serving additional delivery points on an existing route?
- (f) How is remuneration determined for Highway Contract Route carriers determined for serving additional delivery points on an existing route?

USPS/NLPM-RT1-40

At page 16 of your testimony, you state "If a rural post office disappears, the town often disappears."

- (a) Did you personally conduct research before making this claim? If so, please provide all data gathered in the course of your research.
- (b) Please define the term “disappears” as that term is used after the term “often” in your statement.
- (c) Please quantify the frequency to which you refer by use of the term “often.”

USPS/NLPM-RT1-41

At page 13 of your testimony, you state that “many of the elderly in these communities do not drive or have licenses enabling them to go to the nearest town.”

- (a) Define “elderly” as used in your statement.
- (b) What studies or data did you consult prior to finalizing your testimony on the proportion of elderly retail customers that are served by the Post Offices in the RAO Initiative? Please furnish copies of any such studies or data.
- (c) What studies or data did you consult prior to finalizing your testimony on the proportion of elderly delivery customers that are served by the Post Offices in the RAO Initiative? Please furnish copies of any such studies or data.
- (d) What studies or data did you consult prior to finalizing your testimony on the proportion of elderly retail or delivery customers that do not have driver's licenses?

USPS/NLPM-RT1-42

At page 13 of your testimony, you state:

Rural post offices currently provide the following services: stamps, First Class Mail (domestic and international), Priority Mail, Priority Flat Rate Boxes/Envelopes, Express Mail, Certified Mail, Registered Mail, return receipt, Insured Mail, Certificate of Mailing, restricted delivery, collect on delivery, special handling, adult signature required, media mail, parcel post, money orders, signature confirmation, delivery confirmation, bulk mail acceptance, zip code information, international mail, customs forms, file a change of address, stamped envelopes and postcards, Ready Post products and supplies, Sure Money, mailing requirements, file an insurance claim and safe and secure mail box services.

- (a) Identify the services in the list in the quoted passage above that are never provided by rural carriers while serving customers on a rural route.
- (b) Identify the services in the list in the quoted passage above that are never provided by Highway Contract Route carriers while serving customers on their routes.
- (c) Identify the services in the list in the quoted passage above that are never provided by contractor-operated community post offices.

USPS/NLPM-T1-43

On page 20, lines 5-15, you refer to a Gallup poll recounting the public's opposition to Post Office discontinuance.

- (a) Did you participate in the survey design or direct the conduct of the survey?
- (b) Please provide the following: a description of the study plan underpinning the survey described in your testimony, a clear description of the study design, all relevant assumptions underpinning the survey, the techniques or procedures used to compile the data, the definition of the universe under study, and the sampling frame and units surveyed.
- (c) Please provide the following: the date (month, day, and year) on which the survey began and the date (month, day, and year) on which the survey ended (i.e., the survey period).
- (d) Please provide a complete copy of the survey, including all questions posed to survey participants, all instructions provided to survey participants, and, if available to you, complete copies of the individual survey responses received from participants. Names of specific individuals may be redacted.
- (e) Please provide the total number of persons who were provided with an opportunity to participate in the survey
- (f) Please state your understanding of the extent to which the Gallup survey referenced on pages 20-21 of your testimony sought customer reactions to the closure of a local post office branch in the context of a determination that a nearby postal location in combination with one or more alternate access sites were deemed capable of providing the postal services they sought.

USPS/NLPM-RT1-44

On page 19 of your testimony, you recount the experience of Ireland, England, and Wales describing harm to communities attributed to the closing of small rural post offices.

- (a) Explain why the experience of England, Ireland, and Wales is relevant to postal retail operations in the United States?
- (b) What published academic papers or other widely circulated analyses have you performed comparing the experience of Post Office operations and discontinuance efforts in England, Ireland, and Wales with those in the United States? Please provide citations to such publications and internet links to copies of such papers and analyses.

USPS/NLPM-RT1-45

At pages 34 to 35 of your testimony, you identify a number of criteria that should be considered when conducting Post Office discontinuance.

- (a) For each numbered item in your list, please identify the source of authority that you believe requires consideration of each such numbered item. Please identify the source of authority for each numbered item.

- (b) Do you deny that local Post Office discontinuance personnel gather or receive information responsive to each numbered item? Please explain your response.

USPS/NLPM-RT1-46

At page 30 of your testimony, you state that, "People in small towns who are not mobile for any reason (no car, disability, etc.) will not be able to be present at these meetings, and these are the same people with the most desperate need for a local Post Office. This reduces the value of even holding a community meeting."

- (a) Do you deny that persons of limited mobility (no car, disability) could be transported to community meetings by family, friends and neighbors? If your answer is affirmative, please explain your response.
- (b) Do you deny that the Postal Service provides the following other means to solicit customer input, including:
 - (i) Questionnaires mailed to delivery customers of a Post Office being studied for discontinuance, and
 - (ii) Comment forms provided with the posting of the proposal.
- (c) What research was performed to arrive at your conclusions at page 30?
- (d) Was this research performed by you or under your direction?
- (e) Please provide the following: the date (month, day, and year) on which the research began and the date (month, day, and year) on which the research ended (i.e., the survey period).
- (f) Please provide a complete copy of the research results.

USPS/NLPM-RT1-47

Please refer to your testimony at pages 34-35.

- (a) Assume, hypothetically, among many customers who visit a particular RAO Initiative candidate Post Office, the existence of 2 customers whose mail receiving and sending patterns, frequency and nature of Post Office visits, and ability to conduct transactions are virtually identical in every respect. One customer is 35 years old and the other is 65 years old. Please discuss how and why the Postal Service should treat one customer differently than the other in a socially significant way.
- (a) Assume, hypothetically, among many customers who visit a particular RAO Initiative candidate Post Office, the existence of 2 customers whose mail receiving and sending patterns, frequency and nature of Post Office visits, and ability to conduct postal transactions are virtually identical in every respect. One customer is a member of a minority group, as you use the term, and the other is not. Please discuss how and why the Postal Service should treat one customer differently than the other in a socially significant way.

USPS/NLPM-RT1-48

At page 28, lines 1-5 of your testimony, you state, "the fact that the methodology used to calculate other hours is fundamentally flawed, resulting in the data being

skewed. The bottom line of this is that the output from the formulas is highly unreliable and should not be used for the type of evaluative purposes that they are being used for here.”

- (a) What specific data in particular do you consider to be “fundamentally flawed?”
- (b) What specific data do you consider to be “skewed”?
- (c) Do local Post Office discontinuance officials fail to consider other factors in conducting a discontinuance feasibility study other than the data you identify in parts (a) and (b)?
- (d) If your answer to part (c) is affirmative, then do you claim that local officials are not following the requirements of Handbook PO-101 in gathering and considering information received in connection with Post Office discontinuance studies?
- (e) If your answer to part (c) is negative, then what other types of information do local Post Office discontinuance officials consider?

USPS/NLPM-RT1-49

At page. 14, lines 2-4 of your testimony, you state “A United States citizen in a rural town would not have reasonable access to postal services enabling him or her to send a care package, or to purchase a money order to pay a bill.”

- (a) Do you deny that Rural or Highway Contract Route carriers may retrieve packages for mailing from customers through their mailboxes or collection box units?
- (b) Do you deny that Rural or Highway Contract Route carriers may sell money orders by collecting funds and instructions from customers?
- (c) Did Rural and Highway Contract Route carriers reporting to you or your subordinates when you served as a Postmaster retrieve, while serving their routes, packages for mailing from customers?
- (d) Did Rural and Highway Contract Route carriers reporting to you or your subordinates when you served as a Postmaster sell money orders?

USPS/NLPM-RT1-50

At pages 12-15 of your testimony, in discussing Village Post Offices (VPO), you state “The Postal Service's preferred substitute, where any local post office will even be provided, is only a very limited-service retail outlet with three services sold by whoever happens to be behind the counter.”

- (a) Provide support for your claim that the VPO concept is postal management's “preferred” substitute.
- (b) Does your testimony claim that management believes that the VPO is a substitute for a Post Office, to the exclusion of other alternate access channels, such as Rural and Highway Contract Route carriers? If not, please explain your response.

USPS/NLPM-RT1-51

At page 14 of your testimony, you state, “with the new top-down approach and a Vice President from Headquarters giving the directive to close offices, very few District Managers will ever push back to challenge such a Headquarters decision.”

- (a) Did you review Handbook PO-101 revised as of July 2011 prior to finalizing your testimony?
- (b) If your answer to part (a) is affirmative, identify the sections of the Handbook PO-101 that you reviewed that identify a role for a Headquarters Vice President, and briefly describe what those sections say.
- (c) Do you claim that the "top-down" approach provides that a Headquarters Vice President directs the closing of Post Offices by directing field managers to close them? If your answer is affirmative, please explain your response.
- (d) Please confirm, with citations to the current Handbook PO-101, the role that a Headquarters Vice President exercises in connection with the discontinuance of a Post Office, including (i) the initiation of the study of a retail facility for possible discontinuance action, and (ii) the review and signing of a final determination prepared by field management.

USPS/NLPM-RT1-52

At pages 14-15 of your testimony, you state, “It just wouldn’t be a good career move. In fact, what used to be a District Manager-directed initiative now requires that any change to the top-down request requires a minimum of an Area Vice President’s approval before a discontinuance is stopped.”

- (a) Identify the sections of the current USPS Handbook PO-101 that identify a role for a Area Vice President, and describe briefly what those sections say.
- (b) Please confirm that the current USPS Handbook PO-101 identifies a role for an Area Vice President to approve any change to a “top-down” request for the initiation of a feasibility study. If you do not confirm, then please explain your response.

USPS/NLPM-RT1-53

At page 15 of your testimony, you state, “the truth is that this initiative is aimed at rural America”

- (a) Please confirm that your statement is based on the proportion of Post Offices that are the subject of the RAO initiative, as compared to the sum total of Post Offices, stations, and branches that are part of the RAO initiative. If not confirmed, please explain your response.
- (b) In making the above quoted statement, did you also examine the number of retail transactions performed at Post Offices that are part of the RAO

Initiative, as compared to the retail transactions performed at stations and branches that are part of the RAO Initiative? If so, please identify the data that you evaluated and their sources, and provide copies if such information is not in the record in this proceeding.

USPS/NLPM-RT1-54

At page 18, lines 7-9 of your testimony, you describe the experience of Jerome, Arizona, which transformed itself into a thriving arts community, and David, Kentucky, which revitalized itself.

- (a) Identify records or other information that you reviewed that attribute each community's transformation to the presence of a Post Office, and provide copies of such records or information.
- (b) Over what period of time did each transformation occur?
- (c) What was the average number of daily retail transactions at each Post Office for the fiscal year prior to the transformation?
- (d) What was the average number of daily retail transactions at each Post Office for the fiscal year after the transformation?